# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Willie J. Harris Jr.,	)
Complainant,	)
V.	File No. WC-2021-0129
Missouri-American Water Company,	)
Respondent.	)

## MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

**COMES NOW** the Respondent Missouri-American Water Company ("Missouri-American"), by and through the undersigned counsel, and for its *Motion for Extension of Time to File Responsive Pleading* respectfully states to the Missouri Public Service Commission ("Commission") as follows:

- 1. On November 2, 2020, Complainant filed a Complaint against Missouri-American with the Commission.
- 2. On November 4, 2020, the Commission issued its *Notice of Complaint and Order Setting Time for Answer, Directing Filing By Complainant, and Directing Staff Investigation and Report*, directing Respondent to file an answer to the Complaint by December 4, 2020.
- 3. Rule 20 CSR 4240-2.070(8) provides that the Respondent shall answer a complaint within thirty (30) days unless otherwise ordered by the Commission.
- 4. The undersigned counsel asserts that good cause exists to extend the deadline for filing a responsive pleading because counsel with primary responsibility for this matter tested positive for Covid-19, along with much of her family, experienced symptoms, and was out of the office and quarantined with her family from November 6, 2020, through November 30, 2020. As a result, the undersigned counsel has not been able to fully discuss this matter with the client.

5. The undersigned seeks a seven (7) day extension, until December 11, 2020, to file a responsive pleading in this matter.

**WHEREFORE**, Missouri-American requests the Commission grant it until December 11, 2020, to file a responsive pleading in this matter for good cause shown.

Respectfully submitted,

## BRYDON, SWEARENGEN & ENGLAND, P.C.

## By: /s/ Jennifer L. Hernandez

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#### MISSOURI-AMERICAN WATER COMPANY

### /s/ Timothy Luft

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ATTORNEYS FOR MISSOURI AMERICAN WATER COMPANY

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to all parties of record, in addition to a hard copy sent by U.S. Postal Mail, postage prepaid, to Complainant's address on file with the Commission, this 4<sup>th</sup> day of December 2020.

# /s/ Jennifer L. Hernandez